

IN THE U.S. DISTRICT COURT
FOR THE SOUTH CAROLINA DISTRICT
CHARLESTON DIVISION

ARKEIN CAMPBELL,

Plaintiff,

v.

CITY OF NORTH CHARLESTON and
KATELYN ARNOLD,

Defendants.

Case No.: 2:20-cv-00959-RMG-MGB

**DEFENDANT NORTH CHARLESTON'S
RULE 26(a)(2)(C) EXPERT WITNESS
DISCLOSURES**

Pursuant to Rule 26(a)(2)(C) of the Federal Rules of Civil Procedure, Defendant City of North Charleston by and through its undersigned counsel, hereby discloses and designates the following as expert witnesses:

Major Brian S. Batterton, Esquire
Cobb County Police Department
4400 Lower Roswell Road
Marietta, Georgia 30068
Phone 678-230-3248
Email bsbatterton606@gmail.com

Brian Batterton is a Major with the Cobb County Police Department and is also a licensed attorney. He has specialized expertise in the areas methods of providing law enforcement services, law enforcement policies, training, practices, and procedures. He is expected to testify to matters within his experience and training relating to the facts alleged in the Complaint, the testimony provided by witnesses and parties, and the documents produced in discovery. The basis for his opinions are his education, employment, training and experience, as well as his detailed review of the materials in this litigation.

Defendants also reserve the right to call any expert witness who may be required to substitute for an expert listed herein, in the event that the listed expert becomes unavailable to testify at trial due to circumstances beyond Defendants' control.

Lt. Andrew Glover
Training Section
North Charleston Police Department
2500 City Hall Lane
North Charleston S.C. 29406

Andrew Glover, presently a lieutenant with the North Charleston Police Department and assigned to the Training Division and has specialized expertise in the areas of officer training, police procedures, and policies and procedures. He is not retained or specially employed to provide expert testimony in the case and his duties as an employee do not regularly involve giving expert testimony. He is expected to testify to matters within his experience and training relating to the facts alleged in the Complaint, the testimony provided by witnesses and parties, and the documents produced in discovery. The basis for his opinions are his education, employment, training and experience, as well as his detailed review of the materials in this litigation.

Defendant is currently unable to provide any further detail about the intended testimony of this expert as no depositions have been taken at this time and it is unknown what facts will be testified to, outside of those in the body camera video and the incident report. Defendants also reserve the right to call any expert witness who may be required to substitute for an expert listed herein, in the event that the listed expert becomes unavailable to testify at trial due to circumstances beyond Defendants' control.

I, Robin L. Jackson, as attorney for Defendant North Charleston, certify that Major Batterton's resume and fee schedule are being disclosed to Plaintiff's counsel on today's date. Major Batterton's preliminary report is also being provided to Plaintiff's counsel on today's date.

s/ Robin L. Jackson

ROBIN L. JACKSON

Fed. Id No.: 07465

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Attorney for Defendants

January 29, 2021

Charleston, South Carolina